

**U.S. Department of the Interior
Bureau of Land Management
Uncompahgre Field Office
2465 South Townsend Avenue
Montrose, CO 81401**

Determination of NEPA Adequacy (DNA)

NUMBER: DOI-BLM-CO-S050-2009-0029 DNA

PROPOSED ACTION TITLE: Coal Canyon Slashing Project

LOCATION/LEGAL DESCRIPTION: T47N, R15W, Sections 21, 22, 23, 27

APPLICANT: Bureau of Land Management

BACKGROUND:

In October 2000 the Bureau of Land Management (BLM) Uncompahgre Field Office (UFO) implemented a 340 acre habitat improvement project in a formerly chained piñon pine (*Pinus edulis*) and juniper (*Juniperus osteosperma*) woodland to improve mule deer and elk winter ranges and to improve grazing alternatives within the Coal Canyon and Twenty-five Mesa allotments (maps). The impacts from that project were analyzed and mitigated under environmental assessment # CO-150-UB-00-20-EA. A rollerchopper was utilized to break piñon and juniper trees into smaller pieces of vegetative litter on the soil surface. The treatment effectively removed the standing piñon and juniper and was seeded with native grasses, forbs and shrubs.

Subsequent follow-up monitoring of the treatment area has indicated that approximately 15-20% of the piñon and juniper within the treatment area was either not killed, missed, or were too small to be impacted by the rollerchopper during the initial project implementation. Additionally, numerous seedlings have established on the treatment area over the last eight years. If left untreated it is estimated the project area would progress towards late mid-seral piñon-juniper woodland effectively limiting the functionality of the treatments as quality winter range for big game and diminishing the flexibility of the grazing program within 10-20 years. The Uncompahgre Field Office Fire Management Plan describes management objectives that desire up to 20% of elk and mule deer winter range landscapes be maintained in large patches (100-200 acres in size) of early or early-mid seral. Those early seral mosaics should be comprised of mainly grasses, forbs, and the early mid-seral should be comprised grasses, forbs, and shrub vegetation types. These attributes are currently present within the treatment units.

Given that monitoring data indicates that the treatment is beginning to move through successional pathways towards a late mid-seral state with dense young and mature trees and the fire management plan direction for winter ranges, BLM has determined that it is necessary to treat the previously rollerchopped area on public lands to maintain the management objectives

established within the initial project design. The preferred method for maintaining previously roller-chopped units within the UFO is through the use of prescribed fire which has proven to be effective in removing a majority of the debris (micro sites), killing remaining young piñon-juniper trees, removing young seedlings, and re-stimulating the grasses, forbs, and shrubs. However, there is little fine fuel continuity across the project area, the regenerating piñon-juniper is open spaced, and the invasive species cheatgrass (*Bromus tectorum*) is present. This presents difficulties in cost effectively burning the project area and poses possible ecological degradation of the area. Maintaining the treatment area in its current state is easier to accomplish, requiring less impact to the resources present, and at a lower cost to tax payers and will increase the treatment's effectiveness for an additional 20-30 years.

A. Description of the Proposed Action and any applicable mitigation measures

BLM proposes to remove all remaining young piñon-juniper trees and seedlings present on 280 acres of public land within the previously rollerchopped treatment area. The project will be accomplished by a crew hand cutting all the live piñon and juniper seedlings, saplings less than eight feet in height, and trees damaged by the equipment within the rollerchopped areas. Trees will be cut flush to the ground and shall have no live branches remaining. All larger trees that are cut will be limbed, lopped, and scattered to a depth of less than 24 inches. This will be accomplished with hand carried gasoline/battery powered tools (for example chainsaws or brush cutter/clearing saws) or non-powered tools such as axes, brush hooks, brush axes, or lopping shears. All activities will be accomplished on foot as no self propelled cutters/chippers will be utilized to eliminate vehicular travel off of existing roads and trails. The project will not treat ponderosa pine, oakbrush, and piñon or juniper previously untreated or over eight feet tall that were not damaged by the earlier treatments.

Design Features:

- To minimize impacts to Birds of Conservation Concern that are covered under the Migratory Bird Treaty Act project implementation will not take place during the core breeding season (May 15- July 15) for these species.
- The proposed project is within a winter big-game closure area, and is closed from November 1 through April 1 each year. No work will be permitted during the closure period.
- There are several known populations of Naturita Milkvetch (*Astragalus nataritensis*) 1.5 and 2.4 miles to the southwest of the proposed action; there is also a historical occurrence of Grand Junction Milkvetch (*Astragalus linifolius*) 1.6 miles to the east. Both species are considered to be sensitive by the BLM. There are no historic records of the two species being present within the project area however there is potential habitat present within the project area for both species. As such BLM biologist will survey the proposed treatment areas for presence and if found within the project area will be flagged off and avoided by the crew implementing the proposed action.

- A Class III Cultural Resource Inventory was completed within the proposed project area in 2000 prior to the implementation of the rollerchop of the project area. A Class II reconnaissance cultural resource inventory of the area will be completed prior to implementation of the slashing. All sites previously identified and recorded will be avoided.
- The BLM's Hazardous Material Coordinator will be contacted in the event there are any Hazardous Materials spills during project implementation, and hazardous materials will be cleaned up utilizing standard hazardous materials procedures.
- All vehicles will be required to have all dirt and debris that could contain weed seeds removed, and then vehicles will be thoroughly washed with a suitable power washer. This will be a contract stipulation, and washing will be completed prior to moving onto public lands.
- All weed infestations identified through monitoring of the site will be treated and or eradicated using materials and methods approved by BLM and analyzed under the UFO programmatic weed management plan.

Monitoring plan:

The completed project will be mapped using a Geographic Positioning System (GPS). A photo point(s) will also be established after completion of the mechanical portion of the project.

The proposed project will be monitored following treatment, in accordance with the Uncompahgre Field Office vegetation treatment monitoring protocol (currently 2 and 5 years following treatment).

B. Land Use Plan (LUP) Conformance

LUP Name: San Juan/San Miguel Resource Management Plan

Date Approved: September 1985

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:

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- Maintain all existing wildlife habitat improvement facilities. This effort will focus on guzzlers, enclosures, and vegetation treatments.
- Initiate development of new wildlife habitat management plans and related enhancement projects.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

Document: Rollerchop Maintenance Projects - FY 2000 (CO-150-UB-00-20EA)

Date Approved: April 7, 2000

Other document: Uncompahgre Field Office Fire Management Plan

Date Approved: June 2008

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Documentation of answer and explanation: Yes, the proposed action is nearly identical in objectives and intent of the preferred alternative analyzed under the environmental assessment CO-150-UB-00-20EA. In fact the proposed action is less impacting to soil and vegetative resources, as the action will be carried out on foot utilizing hand tools and human power. The project occurs within the same analysis area analyzed under environmental assessment CO-150-UB-00-20EA for the Coal Canyon Rollerchop and Seed and will remove piñon juniper not previously removed during the rollerchop project in 2000.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Documentation of answer and explanation: Yes, as the proposed action is identical in intent as the alternatives analyzed under the environmental assessment CO-150-UB-00-20EA. There are no new environmental concerns or interests apparent that would warrant further analysis. The proposed action will lessen the impact to existing resource values from that which was analyzed in the previous document by conducting the project on foot with hand tools that can more specifically target the individual piñon-juniper trees.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Documentation of answer and explanation: Yes, in fact the proposed action will aid in allowing the previous treatments to remain functional for the desired vegetation structure and age class objectives for a greater period of time thereby contributing to the management objectives outlined in the Mesa Creek land health assessment conducted in 2003-2004.

There are no species listed, proposed, or candidate to the Endangered Species Act, that are known to inhabit areas potentially influenced by the proposed action. This conclusion is based on the no effect determination made in 2000 in environmental assessment CO-150-UB-00-20EA and an analysis of currently listed T&E species their associated habitat requirements and use patterns. This conclusion remains germane as there have been no new critical habitat designations nor no new species listings that encompass habitats potentially influenced by the proposed action. A small Gunnison Prairie dog colony is located to the east of the project area and east of the county road on private lands. This population is considered to be part of the Prairie population, and not part of the Montane population proposed for listing. No prairie dogs are located within the projected area, and the project will have no effect on Gunnison prairie dogs. An analysis of historic and current surveys for BLM sensitive species in the project vicinity and habitat requirements for the BLM sensitive Naturita Milkvetch (*Astragalus nataritensis*) and Grand Junction Milkvetch (*Astragalus linifolius*) suggest that there is potential for the two species to occur within the project area. However no historic occurrences have been documented in the project area by either the Colorado Natural Heritage Program or BLM. Given the previously disturbed nature of the project area and previous negative findings it seems unlikely that either species would occupy the project area. Additional survey will be conducted prior to implementation of the proposed action to confirm these assumptions.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Documentation of answer and explanation: Yes, the direct, indirect, and cumulative impacts are similar to those analyzed under CO-150-UB-00-20EA. The impacts will be less impacting than those analyzed in the previous document as the proposed action will be implemented on foot utilizing hand tools and will be more specific in the removal of regenerating piñon-juniper.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Documentation of answer and explanation: Yes, as there were no negative comments received during the initial scoping for the project. The project will maintain treatments desired by the CDOW for big game winter ranges therefore the State of Colorado is and remains in favor of these treatments designed to improve winter ranges for big game given the level of development occurring in western Colorado. The grazing permittee remains in favor of maintaining the project area in an early seral state as the area contributes to the flexibility of the grazing program and aids in helping to achieve land health standards for the entire grazing allotment.

E. Persons/Agencies /BLM Staff Consulted

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Ken Holsinger	Fuels Specialist	Vegetation
Glade Hadden	Archeologist	Cultural Resources
Melissa Siders	Biological Staff Supervisor	Wildlife/TES Species

REMARKS:

Cultural Resources: A class III Cultural Resource Inventory has been completed for this project and no additional inventory work is required. The previous inventory revealed the presence of National Register eligible properties which were avoided by the initial rollerchop project. These properties will be re-located before the implementation phase of the current project and will be avoided by any potential impacts.

Native American Religious Concerns: There are none known for this project area.

Threatened and Endangered Species: There are no species listed, proposed, or candidate to the Endangered Species Act, that are known to inhabit areas potentially influenced by the proposed action.

MITIGATION:

See the Proposed Action (Design Features).

Conclusion

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

Name of Preparer/Project Lead: Ken Holsinger

Signature of NEPA Coordinator /s/ Bruce Krickbaum Date 03/10/2009

Signature of the Responsible Official /s/ Barbara Sharrow

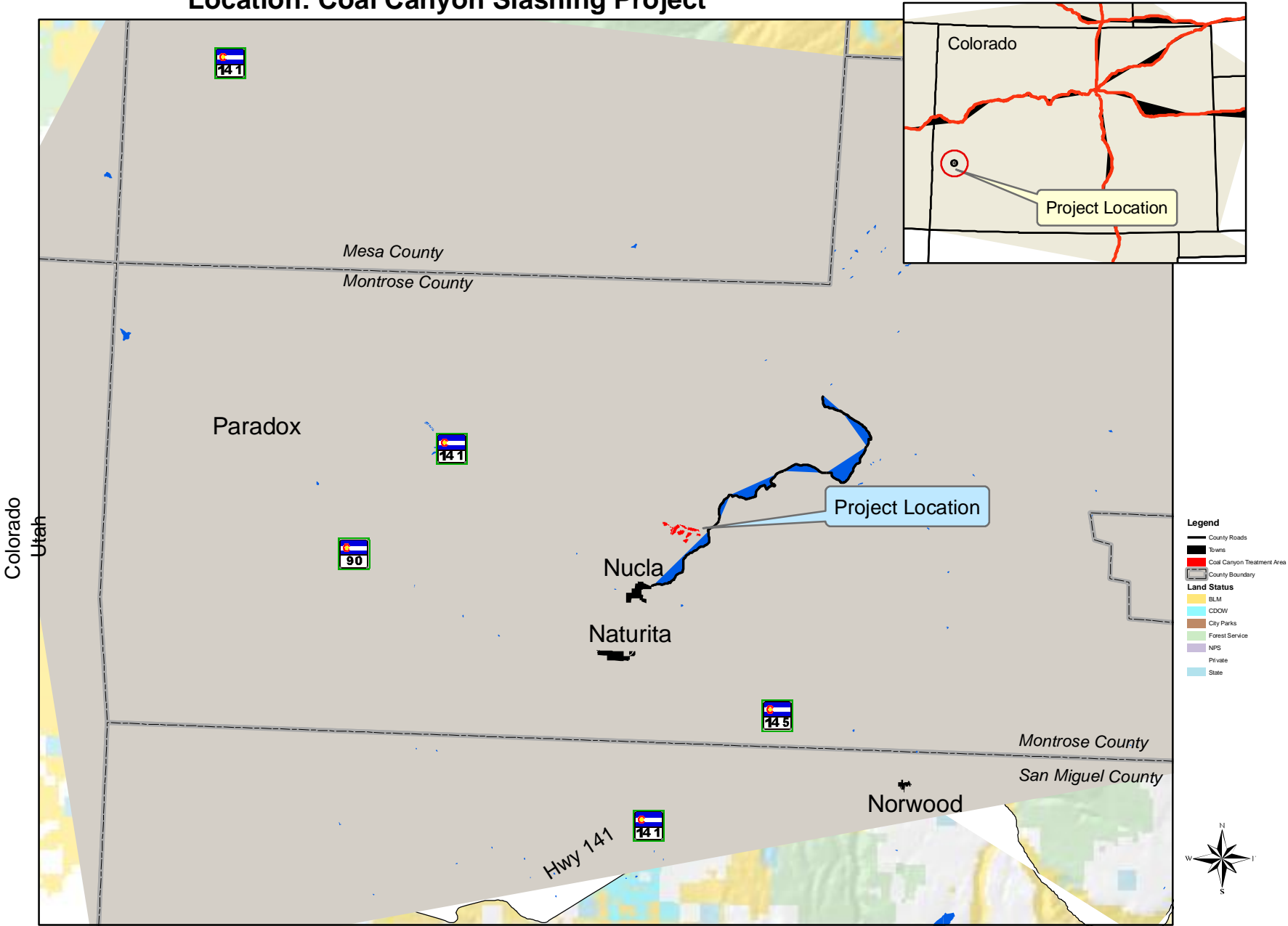
Barbara Sharrow

Field Manager, Uncompahgre Field Office

Date 03/11/2009

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

Location: Coal Canyon Slashing Project



Coal Canyon Slashing Project

February 12, 2009 EM15

USGS TOPO Quad: Nucla & Big Bucktail Creek
T47N R15W Sec. 21, 22, 23, 27

